

## REMARKS

### Rejection under 35 USC 102(2)

Claims 1-2 are rejected under 35 USC 102(e) as being unpatentable over Sutter (USPN 6,446,092 B1, hereinafter "Sutter").

### Invention distinguished from Sutter

Pending claims 1 and 2 have been amended to recite, in the manner claimed, the limitation that requires "constructing links among said nodes of said graph from said foreign key relationships". It is respectfully submitted that claims 1 and 2 as amended are novel, nonobvious and allowable since this limitation, in the combination cited, is not found in Sutter.

Sutter suggests that the non-spine and spine sites of a network topology represented by an Independent Distributed Database system (IDDB) can be represented as nodes in a spanning tree (Sutter column 15, line 62-column 16, line 6 and column 18, lines 3-24). Sutter also identified that tables can have foreign key relationships with other tables (Sutter, column 44, lines 1-40).

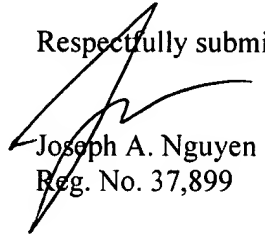
However, Sutter does not suggest or teach the limitation, in the combination claimed, that the links among nodes of the graph can be constructed from said foreign key relationships. From Applicant's reading, it does not appear that Sutter understood that the foreign key relationships can be leveraged to construct the links among nodes of the graph.

Applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at telephone number 1-(408)-210-3170.

The commissioner is hereby authorized to charge any fees that may be due to our Deposit

Account No. 50-2284 (Order No. AMPSP002). A duplicate copy of the transmittal sheet for this amendment is enclosed for this purpose.

Respectfully submitted,



Joseph A. Nguyen  
Reg. No. 37,899

Joseph A. Nguyen, Esq.  
3410 Antonacci Ct.  
San Jose, CA 95148

## Marked Up Claims

In the following claims, the deletions are bracketed (“[ ]”) and insertions are underlined.

1. (Amended) A computer-implemented method for representing a data schema that implements a relational database scheme in a graph, comprising:

identifying tables of said data schema;

representing said tables as nodes of said graph;

identifying foreign key relationships pertaining to individual tables of said data schema; and

[representing said foreign keys relationships as links of said graph] constructing links among said nodes of said graph from said foreign key relationships.

2. (Amended) A computer-implemented method for assisting in the specification of a user data model from a data schema that implements a relational database scheme, comprising:

representing said data schema as a graph, including identifying tables of said data schema, representing said tables as nodes of said graph, identifying foreign key relationships pertaining to individual tables of said data schema, and [representing said foreign keys relationships as links of said graph] constructing links among said nodes of said graph from said foreign key relationships;

extracting from said graph a plurality of possible relationships pertaining to a node in said graph, said plurality of possible relationships pertaining to foreign key relationships that said node has with other nodes of said graph;

presenting said plurality of possible relationships to an operator of a computer; and

facilitating selection of one of said plurality of possible relationships.